

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

KERRY LEWIS, an adult  
individual,

Civil Action No.: 20-cv-1784-JFC

Plaintiff,

vs.

GOOGLE, INC., a corporation, and  
ALPHABET, INC., a corporation,

Defendants.<sup>1</sup>

**DEFENDANTS' MOTION TO DISMISS**

Defendants Google LLC and Alphabet Inc. (unless otherwise specified, together, “Google”), by and through their undersigned counsel, and pursuant to Federal Rule of Civil Procedure 12(b)(6) and LCvR 7, file this Motion to Dismiss Plaintiff Kerry Lewis’s Complaint in its entirety with prejudice.

This Motion to Dismiss is supported by the accompanying Brief in Support, which is incorporated by reference herein and made a part hereof.

WHEREFORE, Google respectfully requests that the Court grant its Motion to Dismiss and enter the proposed Order submitted herewith.

---

<sup>1</sup> Plaintiff misidentified “Google LLC” as “Google Inc.” in the caption.

TUCKER ARENSBERG, P.C.

/s/ Ryan James

Ryan James  
Pa. I.D. #82799

J. Andrew Salemme  
Pa. I.D. #298257

1500 One PPG Place  
Pittsburgh, PA 15222  
(412) 566-1212  
[rjames@tuckerlaw.com](mailto:rjames@tuckerlaw.com)  
[asalemme@tuckerlaw.com](mailto:asalemme@tuckerlaw.com)

Attorneys for Defendants  
Google LLC and Alphabet Inc.

Dated: November 25, 2020

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was served upon the following party via United States mail, first class, postage prepaid, this 25th day of November, 2020:

Kerry Lewis, Esq.  
Lewis, Lewis & Reilly  
1040 Fifth Avenue, 1st Floor  
Pittsburgh, PA 15219

*/s/ Ryan James*  
\_\_\_\_\_  
Ryan James